

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
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LEHMAN COMMERCIAL PAPER INC.	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
SARK MASTER FUND LIMITED,	:	Adv. Case No.
	:	11-01697 (SCC)
Defendant.	:	
	:	
	:	
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STIPULATION AND ORDER EXTENDING TIME TO RESPOND TO COMPLAINT

The Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc. (the “Committee”), on the one hand, and Sark Master Fund Limited (the “Defendant”), on the other hand, respectfully submit this Stipulation and Order Extending Time to Respond to Complaint, and in support thereof, state as follows:

WHEREAS, on March 25, 2011, Lehman Brothers Commercial Paper Inc. (“LCPI”) commenced the above-captioned adversary proceeding (the “Adversary Proceeding”) by filing a complaint (the “Complaint”) against the Defendant.

WHEREAS, on March 29, 2011, the Clerk of the Court issued the Summons and Notice of Pretrial Conference In An Adversary Proceeding (the “Summons”) setting a response date for the Defendant to serve a responsive pleading or an answer to the Complaint under Fed. R. Bankr. P. 7012 within 30 days from the date of the Summons.

WHEREAS, pursuant to the *Order Granting Leave, Standing and Authority to the Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., et al., to Prosecute and, if Appropriate, Settle Causes of Action on Behalf of Lehman Commercial Paper Inc.*, dated September 15, 2011 [Case No. 08-13555; ECF No. 20019], the Committee, represented by Milbank, Tweed, Hadley & McCloy LLP, was granted authorization to prosecute and, if appropriate, settle the above-referenced adversary proceeding on behalf of LCPI.

WHEREAS, pursuant to a series of orders, dated October 20, 2010, June 16, 2011, January 11, 2012, July 18, 2012, January 17, 2013, and February 15, 2013 [Case No. 08-13555; ECF Nos. 12199, 17763, 24198, 29506, 33970, 34697], the Court stayed the Adversary Proceeding until July 20, 2013.

WHEREAS, pursuant to the *Notice of Entry of Order Extending Stay of Avoidance Actions and Granting Certain Related Relief Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 7004(a)(1)*, dated February 19, 2013 [ECF No. 15], the Defendant was required to answer or otherwise respond to the Complaint by September 5, 2013.

WHEREAS, pursuant to that certain *Stipulation and Order Extending Time to Respond to Complaint*, dated August 20, 2013 [ECF No. 17], the deadline for the Defendant to answer or otherwise respond to the Complaint was extended to November 4, 2013.

WHEREAS, pursuant to that certain *Stipulation and Order Extending Time to Respond to Complaint*, dated October 28, 2013 [ECF No. 18], the deadline for the Defendant to answer or otherwise respond to the Complaint was extended to January 3, 2014.

WHEREAS, pursuant to that certain *Stipulation and Order Extending Time to Respond to Complaint*, dated December 20, 2013 [ECF No. 19], the deadline for the Defendant to answer or otherwise respond to the Complaint was extended to March 4, 2014.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Defendant and the Committee that the Defendant shall have a thirty (30) day extension – until April 3, 2014 – to answer or otherwise respond to the Complaint. For the avoidance of doubt, nothing contained herein shall prejudice the right of the Committee and the Defendant to request further extensions of the deadline to respond to the Complaint. When so-ordered by the Court, this stipulation shall constitute both an agreement between the parties and an order of the Court.

Dated: February 28, 2014
New York, New York

/s/ Ronald L. Cohen
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Counsel for the Official Committee of
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Holdings Inc., *et al.*

IT IS SO-ORDERED:
March 4, 2014
New York, New York

/s/ Shelley C. Chapman
HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE